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ROYAL ARCH GUNNISON (1873-1918)
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M.E. MONAGLE (1902-1985)
F.O. EASTAUGH (1913-1992)

JAMES F. CLARK
PAUL M. HOFFMAN
ROBERT P. BLASCO
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ADMITTED IN VIRGINIA,
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ALL OTHERS ADMITTED
IN ALASKA

July 13, 1999

Mr. Scott Thomas
Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 4904

Dear Mr. Thomas:

I am serving as Counsel for the Halter Marine Group, Inc. Political Action Committee ("HALPAC") with respect to case number MUR 4904. Attached is the Statement of Designation of Counsel signed by the new Treasurer of HALPAC. HALPAC is interested in entering into a preprobable cause conciliation with the Federal Election Commission.

The problems with reporting compliance stemmed from medical complications of the former Treasurer of HALPAC, James Ogden. Both Mr. Ogden and his wife experienced serious medical complications in 1998 and 1999, and Mr. Ogden was forced to take medical leave. These health problems are briefly acknowledged in the FEC's Factual and Legal Analysis. Mr. Ogden has since retired from Halter Marine Group, Inc., and has been serving instead as a consultant to the company.

HALPAC takes its reporting requirements very seriously. In an effort to avoid any future problems, HALPAC has taken the following actions:

1. A senior vice president for Halter Marine Group, Inc. will assume responsibility in the future for reporting by being named as Treasurer. The Vice President for Government Affairs, Harvey B. Walpert, was officially designated as Treasurer, effective July 12, 1999.
2. A command system has been established whereby the Custodian of Records/Assistant Treasurer will provide to the Treasurer, a week in advance of the reporting deadline, completed reporting forms and supporting documentation for review and signature by the Treasurer. The Treasurer will immediately inquire on the status of the reports if not

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forwarded by the Custodian/Assistant Treasurer a week in advance, and will accept responsibility for the timely production of the reports within the one week period prior to the deadline. This system will assure the appropriate level of supervision within the HALPAC structure by having at least two individuals involved in the reports.

HALPAC is prepared to enter into pre-probable cause negotiations on a Conciliation Agreement to resolve this matter.

Sincerely,



Brad Gilman
Counsel for Halter Marine Group, Inc. Political Action
Committee

cc: Harvey Walpert, Treasurer
HALPAC

93-044-797-47-10

STATEMENT OF DESIGNATION OF COUNSEL

MUR

4904

NAME OF COUNSEL:

BRAD Gilman

ADDRESS:

2300 Clarendon Blvd.
Arlington VA 22201

TELEPHONE:

703-527-4414

FAX 703-527-0421

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

July 12, 1999

Signature

[Signature]

RESPONDENT'S NAME:

HALTER MARINE GROUP INC. PAC

ADDRESS:

13085 SEAWAY ROAD
Gulfport MS 39505

HOME PHONE:

504-282-2089

BUSINESS PHONE:

228-896-0029